



Kraft Foods

Sheryl A. Marcouiller
Senior Food and Drug Counsel

October 1, 1998

Loretta A. Carey
Food Standards Branch (HFS-158)
Division of Programs and Enforcement Policy
Office of Food Labeling
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, S.W.
Washington, D.C. 20204

Re: Petition for Temporary Marketing Permit
Salad Dressing

Dear Ms. Carey:

Thank you for calling to advise me that Kraft needs to clarify several pieces of information in our May 14th application for a temporary permit to market test salad dressing. You also requested label copy for every size and brand of salad dressing we intend to market under the permit.

In our permit application (section 4.), we requested permission to vary from the standard by using safe and suitable preservatives and emulsifiers and also by lowering the minimum egg content. We proposed to use these techniques singly or in combination, but included them all in one petition to conserve agency resources, especially because the use of preservative and emulsification systems that differ from those in the current standard for salad dressing is common in the food industry.

You advised that we should list the particular preservatives and emulsifiers we propose to use and specify the minimum egg content level we propose. Therefore, we now revise our petition to request permission to use one or more of the following safe and suitable preservatives: potassium sorbate, phosphoric acid, and lactic acid, at levels not to exceed a total of 1% of the salad dressing formula. Similarly, we request permission to use one or both of the following

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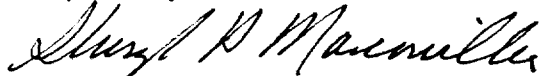
safe and suitable emulsifiers: polysorbate 60 and propylene glycol alginate, at levels not to exceed a total of 3% of the salad dressing formula. Finally, we request permission to lower the minimum egg content to 2% of the salad dressing formula.

Copies of the labels for each product we propose to market under the permit are enclosed. Note that the labels for these products reflect only lowering of the egg content by less than 1/2 %, as that is the particular change we seek to implement at this time. We have attached labels for seven different sizes of Miracle Whip brand salad dressing sold at retail and labels for five sizes of the same product sold to foodservice institutions.¹ We also have attached labels for two products which use the same formula as the Miracle Whip brand salad dressings, but are sold only to industry under the Salad Bowl brand. When we are ready to make the other changes described in this petition, we will submit those labels for agency review.

Additionally, we would like to request that our permit be in effect from November 1, 1998 through January 31, 2000, instead of July 1, 1998 through November 30, 1999. In fact, we would like permission to begin production of the revised formula as soon as possible, but we recognize that the agency needs time to consider the information we are now providing to complete the file.

Please do not hesitate to contact me at 847-646-4206, if you have any additional question. Thank you for your consideration.

Respectfully submitted,



Kraft Foods, Inc.
Sheryl A. Marcouiller

Attachments

¹ There are two labels for one size with different SKU numbers that are substantively identical.